

**IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT  
DUPAGE COUNTY, ILLINOIS, LAW DIVISION**

JOHN SHANKULA; JASON INGMAN; and  
COURTNEY HANSCOM, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

TICKETSONSALE.COM, LLC, a Delaware  
limited liability company; TICKET  
FULFILLMENT SERVICES LP, a Delaware  
limited partnership; and DOES 1-10 inclusive,

Defendants.

Case No.: 2022LA000282

Judge Angelo J. Kappas

Declaration of Todd M. Friedman In Support of  
Motion for Attorneys' Fees, Costs, and Service  
Awards

## **DECLARATION OF TODD M. FRIEDMAN**

I, Todd M. Friedman, declare:

1. I am the name partner at The Law Offices of Todd M. Friedman, P.C. and an attorney in good standing duly admitted to the State Bar of California and before this Court and an attorney of record for plaintiffs John Shankula (“Mr. Shankula”), Courtney Hanscom (“Ms. Hanscom”), and Jason Ingman (“Mr. Ingman,” jointly the “Plaintiffs”) in this class action against defendants Ticketsonsale.com, LLC (“ToS”) and Ticket Fulfillment Services LP (“TFS”) (jointly, “Defendants”).

2. I have been appointed as one of Class Counsel for this matter for settlement purposes.

3. This declaration is submitted in support of Plaintiff’s Motion for Attorneys’ Fees, Costs, Expenses, and Service Awards in the above-captioned action. Except for those matters stated on information and belief, which I am informed and believe are true and correct, I have personal knowledge of all matters set forth herein. If called as a witness, I could and would competently testify thereto.

### **Hours and Costs**

4. As of October 12, 2022, my firm has incurred total 538.8 attorney hours in the litigation against Defendants, which includes time incurred beginning with the action that was filed in the Southern District of California, before the matter was re-filed in the present court. All hours were logged contemporaneously in the normal course of my firm’s business. Specifically, I have incurred 131.7 hours, Adrian Bacon has incurred 173.4 hours, Tom Wheeler has incurred 202.5 hours, and David B. Levin has incurred 31.2 hours.

5. I anticipate my firm will incur many more hours to prepare and file the motion for final settlement approval, prepare for and attend the fairness hearing, and otherwise oversee the settlement and settlement distribution upon final approval.

6. Since my firm works on this and most of our other cases on a contingency fee basis, including this case, my firm has not yet been paid anything for this case to date.

7. As of October 12, 2022, my firm has incurred \$10,344.71 in costs, which I believe were reasonably incurred in this litigation. Below is a true and correct identification of these itemized costs:

<b>Date</b>	<b>Description</b>	<b>Amount</b>
March 23, 2021	Complaint filing fee in California	\$402
April 14, 2021	Rapid Legal Process Service fee	\$195
	JAMS mediation fees	\$8,721.39 (\$12,471.39 - \$3,750 contribution from Kazerouni Law Group, APC)
April 19, 2022	Elite Process Service fee	\$125
April 21, 2022	Elite Process Service fee	\$125
August 8, 2022	On Time Messenger fee	\$60.50
August 8, 2022	FedEx Shipping fees (chambers copy)	\$78.62
August 9, 2022	On Time Messenger Fee	\$60.50
March 23, 2022	Complaint filing fee in Illinois	\$576.70
		<b>TOTAL: \$10,344.71</b>

8. Additional costs may be incurred through final approval.

**Reasonableness of Requested Fees**

9. I believe that the requested awards of attorneys’ fees and costs combined of up to \$1,366,667 (representing one-third of the maximum Cash Fund of \$4,100,000) is fair and reasonable, especially in light of similar awards in other cases, experience of Plaintiff’s counsel, time and effort expended and the risks taken by Plaintiffs’ counsel in pursuing this case and pursuing initial litigation in California, in addition to the settlement results achieved (i.e., obtaining a favorable class-wide resolution in the face of a highly uncertain, and ever-evolving, legal landscape as to core issues in this case relating to requested COVID-19 refunds), and the fact this litigation was taken entirely on a contingency fee basis with no guarantee of recovery. Additionally, the difficulties inherent in certifying the class and then prevailing on the merits to recover these damages for class members, in addition to the years of litigation both would require and the only-marginally-better results projected, clearly favor settlement over continuing to litigate.

**Experience**

10. As one of the main plaintiff litigators of consumer rights cases in Southern California, Mr. Friedman has been requested to and has made regular presentations to community organizations regarding debt collection laws and consumer rights.

11. The Law Offices of Todd M. Friedman, P.C. has litigated over 1,000 individual based consumer and employment cases and litigated over 200 consumer and employment class actions. These class actions were litigated in federal courts in California, as well as California State Courts. Approximately 100% percent of my practice concerns consumer litigation in general.

12. The Law Offices of Todd M. Friedman, P.C. has repeatedly been approved by courts as adequate class counsel and is highly experienced in litigating class actions, including consumer rights class actions.

13. The Law Offices of Todd M. Friedman has served as plaintiffs' counsel in at least the following class actions involving various wage and hour and consumer rights claims where a settlement was reached on a class-wide basis and has achieved more than \$300,000,000 in class-wide relief:

- a. *Dancer v. L.A. Times*, BC472154 (L.A. Superior Court) (common fund class-wide settlement of \$3 million to \$4 million; final approval granted);
- b. *Couser v. Comenity Bank*, 3:12-cv-02484-MMA-BGS (S.D. Cal.) (\$8.475 million class-wide settlement achieved; final approval granted);
- c. *Stemple v. QC Financial Services Group of California, Inc.*, 3:12-cv-01997-CAB-WVG (S.D. Cal.) (certified class achieved by motion, and subsequent class-wide settlement of \$1.5 million achieved; final approval granted);
- d. *Couser v. Apria Healthcare, Inc.* 8:13-cv-00035-JVS-RNB (C.D. Cal.) (common fund class-wide settlement of \$400,000 to \$750,000; final approval granted);
- e. *Abdeljalil v. General Electric Capital Corporation*, 12-CV-02078-IEG-RBB (S.D. Cal.) (class-wide settlement with common fund of \$6.125 million achieved; final approval granted);
- f. *Fox v. Asset Acceptance*, 3:13-CV-00922-DMS-BGS (S.D. Cal.) (common fund of \$1 million in class-wide relief achieved; final approval granted);
- g. *Friedman v. LAC Basketball Club, Inc.*, 2:13-cv-00818-CBM-AN (C.D. Cal.) (class-wide settlement achieved; final approval granted);
- h. *Gerich et al. v. Chase Bank USA et al.* Case No 1:12-cv-5510 (N.D. Ill.) (class-wide settlement of \$34 million; final approval granted);

- i. *Than Zaw v Nelnet, Inc.*, Penal Code § 632 class – (Achieved class-wide settlement of \$1,188,110; final approval granted);
- j. *Medeiros v HSBC*, (common fund settlement of \$4.5 million - \$6.5 million achieved; final approval granted);
- k. *Ann Fox v. Spectrum Club Holding Company et al.*, Case No. 2:14-CV-06766-PSG-FFMx (class-wide settlement; final approval granted);
- l. *Sayan Aboudi v. T-Mobile USA, Inc.*, Case No. 3:12-cv-02169-BTM-NLS (class-wide settlement in TCPA case, with common fund of \$2.5 million to \$5 million and average per class member payment of \$500; final approval granted);
- m. *Andrew Roseman v. BGASC, LLC, et al.*, Case No. EDCV 15-1100-VAP (SPx) (C.D. Cal.) (class-wide relief achieved; final approval granted);
- n. *Everado Gonzalez v The Scotts Company*, Case No. BC577875, Consolidated with Case No: BC570350 (LASC) (class-wide settlement of \$925,000 in wage and hour class action on behalf of approximately 603 employees achieved; final approval granted);
- o. *Payton v Luxe Valet*, Case No. BC588462 (LASC) (\$2.4 million class-wide settlement on behalf of 1,800 employees misclassified as independent contractor; final approval granted);
- p. *Shelby v Two Jinn, Inc.*, Case No. 2:15-cv-03794-AB-GJS (C.D. Cal.) (EFTA class action involving no cognizable actual damages, with company net worth of \$25 million, settled for non-reversionary common fund of \$457,000, despite liability under 15 U.S. Code § 1693m(a) likely being only \$250,000; zero objections; final approval granted);
- q. *Couser v Dish One Satellite*, Case No. 5:15-cv-02218-CBM-DTB (C.D. Cal.) (TCPA class action; final approval granted);
- r. *Couser v Dish One Satellite*, Case No. RIC 1603185 (Riverside S.C.) (Penal Code 632 class action; final approval granted);
- s. *De La Paz v Accurate Courier NCA LLC*, Case No. 16CV00555 (Santa Cruz County Superior Court) (PAGA and Labor Code class action; final approval granted);
- t. *Ross v Zurixx LLC*, Case No. 34-2016-00190874 (Sacramento SC) (UCL, FAL and CLRA class action alleging false advertising for real estate educational courses, non-reversionary common fund settlement for over \$600 per class member; final approval granted);

- u. *Eubank v Terminix International, Inc.*, Case No. 3:15-cv-00145-WQH-JMA (PAGA settlement reached in wage and hour action on behalf of pest control technicians; final approval granted);
- v. *Holland v Tenet Healthcare Corporation*, Case No. 15CVP0226 (Superior Court of San Luis Obispo County) (PAGA settlement reached in wage and hour action on behalf of nurses; final approval granted);
- w. *Jonathan Weisberg, v. HD Supply, Inc.*, Case No. 15-cv-08248-FMO (MRWx) (class-wide settlement in TCPA class action, settled for \$1.225 million; final approval granted);
- x. *Miler v Pacific Auto Wash Partners*, Case No. 30-2015-00813013-CU-OE-CXC (wage and hour class action; final approval granted);
- y. *Sonia Barrientos v Law Office of Jeffrey H. Jordan*, Case No. 2:15-cv-06282-JAK-GJS (FDCPA/RFDCPA letter class action, settled on class wide basis; final approval granted);
- z. *Tahmasian v Midway Rent A Car*, Case No. 30-2015-00813013-CU-OE-CXC (LASC) (PAGA and Labor Code class action; final approval granted);
- aa. *Craig Cunningham v Lexington Law Firm*, Case No. 1:17-cv-00087-EJF (N.D. UT) (TCPA class action MDL involving solicitation prerecorded voice calls made by a third party, vicarious liability alleged; final approval granted).
- bb. *Sheena Raffin v Medicredit, Inc.*, et al., Case No. 2:15-cv-04912-MWF-PJW (C.D. Cal.) (Cal. Penal Code § 632.7 class action certified by Hon. George H. King Ret under Rule 23(b)(2) and (b)(3) by contested motion on behalf of 11,000 class members whose calls were recorded without knowledge or consent, settled for \$5 million; final approval granted);
- cc. *Fernandez v Reliance Home Services, Inc.* Case No. BC607572 Los Angeles Superior Court (wage and hour plus PAGA class action; final approval granted);
- dd. *Anne Wolf v Hewlett Packard Company*, Case No. 5:15-cv-01221-TJH-GJS (C.D. Cal.) (CLRA class action certified by contested motion on behalf of tens of thousands of consumers who purchased printer that was falsely advertised to include Smart Install feature, settled on a wider multi-state, multi-product basis; final approval granted);
- ee. *Jaylinda Girardot et al v. Bail Hotline Bail Bonds, Inc.*, Case No. BC700131 Los Angeles County Superior Court (wage and hour plus PAGA class action; final approval granted);
- ff. *Ryoo Dental, Inc. v OCO Biomedical, Inc.*, Case No. 8:16-cv-01626-DOC-KES (TCPA fax blast class action, settled on class-wide basis; final approval granted);

- gg. *Wondra Curtis v The Anthem Companies, Inc.*, Case No. 8:16-cv-01654-DOC-JCG (wage and hour class action for off the clock work, settled on class-wide basis; final approval granted);
- hh. *Weinberg v Clariant, Inc.* Case No. 56-2017-00494914-CU-NP-VTA Ventura County Superior Court (Rosenthal Fair Debt Collection Practices Act class action settled on behalf of 1,830 class members for privacy infringements through clear envelope debt collection letters; final approval granted);
- ii. *Aliav v Sunset Eats, LLC*, Case No. BC655401 Los Angeles Superior Court (false advertising class action on behalf of approximately 10,000 consumers, settled on class-wide basis; final approval granted);
- jj. *Alfred Zaklit, et al. v. Nationstar Mortgage LLC*, Case No. 5:15-cv-02190-CAS-KK (C.D. Cal.) (Cal. Penal Code § 632.7 class action certified by contested motion under Rule 23(b)(2) and (b)(3) on behalf of over 40,000 class members whose calls were recorded without knowledge or consent; final approval granted);
- kk. *Mark Silva v. Olson and Co. Steel*, Case No. 17CV001045 (Contra Costa County Superior Court) (wage and hour class action settled on behalf of 563 class members, final approval granted);
- ll. *Cohen v. Coca-Cola Refreshments, USA, Inc.*, Case No. 2:19-cv-04083-JAK (PLAx) (C.D. Cal.) (wage and hour class action settlement on behalf of trucking employees; preliminary approval granted);
- mm. *Manopla v. Home Depot USA, Inc.* Case No. 15-1120 (D. N.J.) (TCPA class action; final approval granted);
- nn. *Cawthorne v Rush Truck Centers of California, Inc.* Case No. 5:17-cv-01541-JGB-SP (wage and hour class action on behalf of 560 employees; final approval granted);
- oo. *Lizama v Medical Data Systems, Inc.* Case No. 34-2017-00210986-CU-NP-GDS (Sacramento County Superior Court) (Penal Code 632.7 class action alleging illegal call recording, settled for \$2.2 million on behalf of over 30,000 consumers, final approval granted);
- pp. *Romano v SCI, Inc.* Case No. 2:17-cv-03537-ODW-JEM (wage and hour class action for independent contractor misclassification, settled for \$2.5 million on behalf of 230 employees, final approval granted);

- qq. *Edward Makaron v. Enagic USA, Inc.*, Case No. 2:15-cv-05145-DDP-E (C.D. Cal.) (TCPA class action certified on behalf of approximately 2,000,000 class members under Rule 23(b)(2) and 23(b)(3), subsequently settled on a Rule 23(b)(2) and 23(b)(3) basis, final approval granted);
- rr. *Walsh v Fry's Electronics, Inc.* Case No. MSC18-01681 (Contra Costa County Superior Court) (Gift Card Act, CLRA, UCL, FAL class action settled for class-wide public injunctive relief; final approval granted);
- ss. *In RE HP Firmware Update Litigation*, Case No. 5:16-cv-05820-EJD (N.D. Cal.) (co-lead class counsel in consolidated Unfair Competition class action alleging HP pushed a firmware update on consumers' printers that blocked their ability to use third party ink cartridges, preliminary approval granted; final approval granted);
- tt. *Nishimoto v T&S Business Corporation*, Case No. 34-2017-00211426 (Sacramento County Superior Court) (wage and hour and PAGA class action on behalf of janitorial workers; final approval granted);
- uu. *Rodriguez v. Experian Information Solutions, Inc. et. al.* Case No. 2:15-cv-01224-RAJ (W.D. Wash.) (FCRA class action for improper credit pulls; certified under Rule 23 by contested motion, and settled on class-wide basis, final approval granted);
- vv. *Ahmed v HSBC Bank USA*, Case No. 5:15-cv-02057-FMO (SPx) (C.D. Cal.) (TCPA class; final approval granted);
- ww. *Garcia et. al. v. HMS Host, Inc.*, Case Jo. 17-cv-03069-RS (N.D. Cal.) (wage and hour class action, final approval granted);
- xx. *Aiken v. Malcolm Cisneros, A Law Corporation*, Case No. 5:17-cv-02462-JLS-SP (C.D. Cal.) (Fair Debt Collection Practices Act class action, settled on class wide basis, preliminary approval granted);
- yy. *Bonilla, et al. v. Windsor Fashion, LLC*, Case No. CIVDS1723088 (wage and hour class action settled on behalf of over 5,000 employees, final approval granted);
- zz. *Medina v. Enhanced Recovery Company, LLC*, Case No. 2:15-cv-14342-JEM/MAYNARD (S.D. Fla.) (TCPA class settlement common fund of \$1.45M, final approval granted);
- aaa. *Pena v. John C Heath Attorney at Law, PLLC*, Case No. 1:18-cv-24407-UU (S.D. FL.) (consolidated TCPA class action, final approval granted);



- bbb. *Kim v. Tinder, Inc.*, Case No. 2:18-cv-03093-JFW-AS (C.D. Cal.) (Unruh Act class settlement on behalf of 240,000 consumers; granted final approval, case on appeal);
- ccc. *Griffey v. TA Operating, LLC*, Case No. CIVDS1907259 (San Bernardino County Superior Court) (PAGA settlement \$390,000; final approval granted);
- ddd. *D'Angelo Santana v. Rady Children's Hospital*, Case No. 37-2014-00022411-CU-MT-CTL (San Diego County Superior Court) (Confidentiality of Medical Information Act, Cal. Civ. Code § 56, *et seq.* class settlement; final approval granted);
- eee. *Chavis v. Three Group, Inc.*, Case No. 18STCV08737 (Los Angeles County Superior Court) (wage and hour PAGA settlement on behalf of dancers alleging contractor misclassification; final approval granted);
- fff. *Fabricant v. AmeriSave Mortgage Corporation*, Case No. 2:19-cv-04659-AB-AS (C.D. Cal.) (\$6.25 million common fund TCPA class action settlement, final approval granted);
- ggg. *El Nasleh v. California Spaghetti Restaurants, Inc.*, Case No. CIVDS1812587 (San Bernardino County Superior Court) (consolidated wage and hour class action settlement on behalf of restaurant employees settled for \$1.5M, preliminary approval pending);
- hhh. *Fisher v Osmose Utilities Services, Inc.*, Case No. 1:18-cv-01704-NONE-EPG (E.D. Cal.) (wage and hour class action settlement on behalf of electrical utilities employees, preliminary approval pending);
- iii. *Nizam v Phiadon International USA, Inc.*, Case No. CGC-20-582322 (San Francisco Superior Court) (wage and hour misclassification class action settlement, preliminary approval pending);
- jjj. *Western Dental Wage and Hour Cases*, JCCP No. 5079 (County of Sacramento) (consolidated JCCP wage and hour class action settlement, LOTMF acted as lead liaison counsel on behalf of dental employees, preliminary approval pending);
- kkk. *Barron v Paragon Building Maintenance, Inc.*, Case No. BC713754 (Los Angeles Superior Court) (wage and hour class action settlement on behalf of janitorial employees, final approval granted);
- lll. *Randolph v. Amazon.com LLC et. al*, Case No. 37-2017-00011078-CU-OE-CTL (San Diego County Superior Court) (wage and hour class action settlement on behalf of delivery drivers, preliminary approval granted final approval granted);

- mmm. *Barnett v Trigram Education Partners, LLC*, Case No. ESX-L-006106-20 (N.J. Superior Court county of Essex) (wage and hour class action settlement on behalf of university employees, preliminary approval pending);
- nnn. *Dilworth v Hong Holdings, LLC* Case No. 19STCV24101 (Los Angeles Superior Court) (consolidated wage and hour class action settlement on behalf of gas station employees, preliminary approval pending);
- ooo. *Winters v Two Towns Ciderhouse, Inc.* Case No. 20-cv-00468-BAS-BGS (S.D. Cal.) (nationwide false advertising class action settlement on behalf of consumers who purchased mislabeled products, preliminary approval granted, final approval granted);
- ppp. *Vaccaro v Super Care, Inc.*, Case No. 20STCV03833 (Los Angeles Superior Court) (CIPA class action settlement on behalf of over 50,000 consumers, preliminary approval pending);
- qqq. *Mansour v Bumble, Inc.*, Case No. RIC1810011 (Riverside Superior Court) (Largest Unruh Act class settlement in the history of statute, \$70M in classwide benefits on behalf of 2 million consumers; preliminary approval granted);
- rrr. *Caldera v. American Medical Collection Association*, (C.D. Cal.) Case No. 2:16-cv-00381-CBM-AJW (TCPA class action certified by contested motion, settled on classwide basis out of bankruptcy proceeding, preliminary approval granted);
- sss. *Hale v. Mana Pro Products, LLC*, Case No. 2:18-cv-00209-KJM-DB (E.D. Cal.) (false advertising class action, final approval granted);
- ttt. *Vaccaro v Super Care, Inc.*, Case No. 20STCV03833 (Los Angeles Superior Court) (CIPA class action settlement on behalf of over 50,000 consumers, preliminary approval pending);
- uuu. *Vaccaro v Delta Drugs II, Inc.*, Case No. 20STCV28871 (Los Angeles Superior Court) (CIPA class action settlement on behalf of consumers, preliminary approval pending);
- vvv. *Marko, et al. v. Doordash, Inc.*, Case No. BC659841 (Los Angeles County Superior Court) (First-filed and co-lead counsel in consolidated gig economy misclassification class action on behalf of delivery drivers, secured \$100 million common fund settlement, largest gig economy class settlement to date; preliminary approval granted); and
- www. *Aleksanian, et al. v. Enrich Financial, Inc.*, Case No. BC698829 (Los Angeles County Superior Court) (certified class by contested motion under Credit Repair Organization

Act, California Credit Services Act and Federal Credit Repair Organization Act, preliminary approval pending).

14. My office has extensive class action experience, including consumer rights class actions cases such as this. We have been lead counsel, or co-lead counsel in five eight figure class action settlements. We have certified roughly a dozen class actions by contested motion. We have been appointed interim lead class counsel in a number of consolidated class actions that are currently pending. We have litigated and prevailed in a number of appellate decisions in the California Court of Appeal, Eleventh Circuit, Second Circuit, and Ninth Circuit in cases involving class claims, as well as assisting with briefing in two class actions before the United States Supreme Court.

15. In January, we argued an important class action before the California Supreme Court concerning the California Invasion of Privacy Act in *Smith v. LoanMe, Inc.*, 2021 WL 1217873 (Cal. S. Ct. April 1, 2021). Prior to the appeal, we successfully petitioned for review, despite there being no split in appellate authority at the time. The unanimous decision of the Supreme Court fully and overwhelmingly sided with our position.

16. My firm also certified the following cases as class actions by contested motion and was appointed class counsel. I wrote the certification briefs for the majority of these cases:

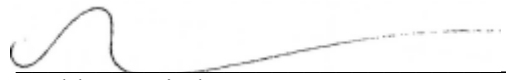
- a. *Anne Wolf v. Hewlett Packard Company*, Case No. 5:15-cv-01221-TJH-GJS (C.D. Cal.) (class action certified by contested motion on behalf of tens of thousands of class members who purchased printer that was falsely advertised to include Smart Install feature);
- b. *Caldera v. American Medical Collection Association*, Case No. 2:16-cv-00381-CBM-AJW (C.D. Cal.) (TCPA class action certified by contested motion);
- c. *Alfred Zaklit, et al. v. Nationstar Mortgage LLC*, Case No. 5:15-cv-02190-CAS-KK (C.D. Cal.) Cal. Penal Code § 632.7 class action certified under Rule 23(b)(2) and (b)(3) on behalf of class members whose calls were recorded without knowledge or consent);
- d. *D'Angelo Santana v. Rady Children's Hospital*, Case No. 37-2014-00022411-CU-MT-CTL (San Diego County Superior Court) (Confidentiality of Medical Information Act, Cal. Civ. Code § 56, *et seq.*);
- e. *Edward Makaron v. Enagic USA, Inc.*, Case No. 2:15-cv-05145-DDP-E (C.D. Cal.) (TCPA

class action certified on behalf of approximately 2,000,000 class members under Rule 23(b)(2) and 23(b)(3));

- f. *Rodriguez v. Experian Information Solutions, Inc., et al.*, Case No. 2:15-cv-01224-RAJ (W.D. Wash.) (FCRA class action for improper credit pulls; certified under Rule 23);
- g. *Sheena Raffin v. Mediacredit, Inc., et al.*, Case No. 2:15-cv-04912-MWF-PJW (C.D. Cal.) (Cal. Penal Code § 632.7 class action certified by Hon. George H. King Ret. under Rule 23(b)(2) and (b)(3) on behalf of class members whose calls were recorded without knowledge or consent);
- h. *Stemple v. QC Financial Services Group of California, Inc.*, Case No. 3:12-cv-01997-CAB-WVG (S.D. Cal.) (certified class achieved by motion, and subsequent class-wide settlement);
- i. *Abdeljalil v. General Electric Capital Corporation*, Case No. 12-CV-02078-IEG-RBB (S.D. Cal.) (certified class achieved by motion, and subsequent class-wide settlement);
- j. *Aleksanian, et al. v. Enrich Financial, Inc.*, Case No. BC698829 (Los Angeles County Superior Court) (certified class under Credit Repair Organization Act, California Credit Services Act and Federal Credit Repair Organization Act).

17. Our firm has co-counseled extensively with Kazerouni Law Group, APC, on numerous class action matters, including this one. I believe our strong working relationship allows our firms to jointly provide exceptional representation to settlement class members

I declare under penalty of perjury under the laws of California and the United States that the foregoing is true and correct. Executed in Los Angeles, California, on October 17, 2022.

  
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Todd M. Friedman

